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December 20, 2017

The Honorable Nicholas G. Garaufis  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *State of New York, et al. v. Donald Trump, et al.*, 17 Civ. 5228 (NGG) (JO)  
*Batalla Vidal, et al. v. Baran, et al.*, 16 Civ. 4756 (NGG) (JO)

Dear Judge Garaufis:

Our firm serves as *pro bono* counsel to United We Dream (“UWD”). We respectfully submit this letter to seek this Court’s leave to file a brief on behalf of UWD as amicus curiae in support of the Plaintiffs’ motions for a preliminary injunction and in opposition to the Defendants’ motions to dismiss in the two above-captioned cases. Counsel for all parties to these cases have consented to UWD’s filing of an amicus brief.

UWD is a national nonprofit, nonpartisan, membership-based organization comprising more than 300,000 immigrant youth and their allies, with 52 affiliate organizations in 25 states. UWD’s primary purpose is to advocate for the dignity and fair treatment of immigrant youth and their families, regardless of their immigration status. Many UWD members are beneficiaries of the Deferred Action for Childhood Arrivals initiative announced on June 15, 2012. Because the government action in this case seeks to undo the Deferred Action for Childhood Arrivals’ protections — protections that have formed the basis for the most consequential life decisions of hundreds of thousands of immigrant youth — UWD has a substantial interest in the proper resolution of the issues presented here.

“District courts have broad discretion in deciding whether to accept amicus briefs.” *Jamaica Hosp. Med. Ctr., Inc. v. United Health Grp.*, 584 F. Supp. 2d 489, 497 (E.D.N.Y. 2008) (citation omitted). “An amicus brief should normally be allowed when . . . the amicus has unique information or perspective that can help the court beyond the held that the lawyers for the parties are able to provide.” *Citizens Against Casino Gambling in Erie Cnty. v. Kempthorne*, 471 F. Supp. 2d 295, 311 (W.D.N.Y. 2007) (citation omitted); *see also Northern Marina Islands v. United States*, 2009 WL 596986, at \*1 (D.D.C. Mar. 6, 2009) (“The filing of an amicus brief should be permitted if it will assist the judge ‘by presenting ideas, arguments, theories, insights, facts or data not to be found in the parties’ briefs’”) (citation omitted).

We respectfully ask the Court to exercise its discretion to permit UWD to file the attached amicus curiae brief. The brief offers a unique perspective on the issues in these cases

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and does not unduly repeat the parties' arguments. Specifically, UWD draws upon the real-life experiences of immigrant youth and their families, particularly those benefited by DACA, to provide the Court with a glimpse into the lives of the countless young men and women who placed their trust in, and organized their lives around, DACA. UWD hopes to illustrate how, from diverse origins spanning the globe — including India, the Philippines, China, and Mexico — DACA recipients are now fully part of the fabric of America. As a result, the government's rescission of this program that has given hope to so many threatens to cause massive disruption to these individuals, their families, and their local communities — communities that extend well beyond recipients of the DACA program. The proposed amicus brief therefore will "assist the Court in reaching the right decision in . . . case[s] affected with the interest of the general public." *Russell v. Bd. of Plumbing Examiners*, 74 F. Supp. 2d 349, 351 (S.D.N.Y. 1999).

For the foregoing reasons, UWD respectfully requests permission to file its proposed amicus brief on or before December 22, 2017.

Very truly yours,

By /s/ Peter Karanjia

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cc: All Counsel of Record  
(VIA ECF)